

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:22-cv-61463-JB – BECERRA
CONSENT CASE

APOLONIO ALVARADO, EDWIN
ZAMBRANO, and JESUS RAMIREZ

Plaintiffs,

v.

YES NAKED TACO PROM, LLC,
YES HOSPITALITY, LLC, YES DREAM,
LLC, RALPH PAGANO, and JAY N.
SHIRODKAR,

Defendants.

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JOINT NOTICE OF SETTLEMENT

Plaintiffs and Defendants, by and through their respective undersigned counsel, pursuant to S.D. Fla. L.R. 16.4, hereby jointly give notice that the parties have reached a settlement in principle. The parties are currently working on written settlement agreements. The parties acknowledge that their settlement will need to be approved by the Court pursuant to Lynn's Food Stores, Inc. v. United States, 679 F.2d 1350 (11th Cir. 1982). Confidentiality is a material term of the parties' settlement, and the parties respectfully request that the Court permit the parties to submit their settlement agreements to Chambers via email for review *in camera* and/or conduct a fairness hearing at which the terms of the settlement can be disclosed.

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Respectfully submitted this 12th day of December, 2022.

s/ J. Freddy Perera

J. Freddy Perera, Esq.

Florida Bar No. 93625

E-mail: freddy@pba-law.com

PERERA ALEMÁN

2030 S. Douglas Road, Suite 203

Coral Gables, FL 33134

Tel.: (786) 485-5232

Attorneys for Plaintiffs

s/ Adam S. Chotiner¹

Adam S. Chotiner, Esq.

Florida Bar No. 0146315

E-Mail: achotiner@sbwh.law

SHAPIRO, BLASI, WASSERMAN

& HERMANN, P.A.

7777 Glades Road, Suite 400

Boca Raton, FL 33434

Tel.: (561) 477-7800

Fax: (561) 477-7722

Attorneys for Defendants

¹ J. Freddy Perera has provided Adam S. Chotiner with express authority to jointly file this notice.

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the Service List below via transmission of Notices of Electronic Filing generated by CM/ECF.

s/ Adam S. Chotiner
ADAM S. CHOTINER, ESQ.

SERVICE LIST

Apolonio Alvarado, et al. v. Yes Naked Taco Prom, LLC, et al.
Case No. 0:22-cv-61463-JEM
United States District Court, Southern District of Florida

Brody Max Shulman, Esq. E-Mail: brody@pba-law.com Jorge Freddy Perera, Esq. E-Mail: freddy@pba-law.com Perera Barnhart Aleman 12555 Orange Drive, Second Floor Davie, FL 33330 Tel: (786) 485-5232 Counsel for Plaintiffs <i>Via CM-ECF</i>	Adam S. Chotiner, Esq. E-Mail: achotiner@sbwh.law Shapiro, Blasi, Wasserman & Hermann, P.A. 7777 Glades Rd., Suite 400 Boca Raton, FL 33434 Tel: (561) 477-7800 Fax: (561) 477-7722 Counsel for Defendants <i>Via CM/ECF</i>
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